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Lead Counsel for Court-Appointed Lead Plaintiff and the Class

[Additional Counsel Listed on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER TO ADD NEW PLAINTIFF**

Judge: Hon. Richard Seeborg

WHEREAS, Lead Plaintiff Arman Anvari filed a Consolidated Complaint (“Complaint”) (Dkt. No. 108) against Dynamic Ledger Solutions, Inc. (“DLS”), Tezos Stiftung, (“Tezos Foundation”), Kathleen Breitman, Arthur Breitman, Timothy Cook Draper (“Draper”), Draper Associates V Crypto LLC (“Draper Associates Crypto”) and Bitcoin Suisse AG (“Bitcoin Suisse”);

WHEREAS, on August 7, 2018, and August 31, 2018 the Court issued orders (Dkt. Nos. 148 and 163) granting the motions to dismiss the Complaint filed by Draper, Draper Associates Crypto and Bitcoin Suisse, and dismissing these Defendants from this action with prejudice;

WHEREAS, on September 14, 2018, DLS, the Tezos Foundation, Kathleen Breitman and Arthur Breitman (collectively, “Defendants”) filed their answers (Dkt. Nos. 168-171) to the Complaint;

WHEREAS, on November 21, 2018, Pumaro LLC (“Pumaro” and together with Arman Anvari, “Plaintiffs”) was added as a named plaintiff, pursuant to a stipulation and order (Dkt. No. 183);

WHEREAS, Plaintiffs seek to add Artiom Frunze as a plaintiff to this action; and

WHEREAS, Plaintiffs and Defendants have agreed that Artiom Frunze may be added to the Complaint without the need to file an amended pleading and, therefore, amended answers by Defendants;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of Plaintiffs and Defendants that:

(a) The Complaint is amended to add plaintiff Artiom Frunze and the following allegation as paragraph 14b:

Plaintiff Artiom Frunze is an individual who invested 238 Ethereum in the Tezos ICO on July 2, 2017 and July 3, 2017. He was promised delivery of 165,607.38 Tezos tokens upon the conclusion of the Tezos ICO and the launch of the Tezos network.

(b) Defendants, and each of them, answer paragraph 14b as follows :

Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations in paragraph 14b pertaining to Artiom Frunze’s alleged contribution to the Fundraiser, and on that basis deny them. Except as expressly admitted, Defendants deny each and every remaining allegation of paragraph 14b.

Stipulated and agreed to by:

Dated: January 4, 2019

Respectfully Submitted,

LTL ATTORNEYS LLP

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SO ORDERED:

Dated: January __, 2019

The Hon. Richard Seeborg
United States District Judge